

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**In Re: Methyl Tertiary Butyl Ether
("MTBE")
Products Liability Litigation**

This document pertains to:

*New Jersey Department of Environmental
Protection, et al. v. Atlantic Richfield
Company, et al.,*

Case No. 08-cv-00312

**Master File No.: 1:00-1898
MDL 1358 (SAS)
M21-88**

**THIRD PARTY DEFENDANT, H.P. DELTA, INC'S
NOTICE OF MOTION FOR SUMMARY JUDGMENT**

Stuart J. Lieberman, Esq.
LIEBERMAN & BLECHER, P.C.
10 Jefferson Plaza, Suite 400
Princeton, New Jersey 08540
(732) 355-1311
On behalf of the Third Party
Defendant, H.P. Delta, Inc.

To: All Counsel of Record

PLEASE TAKE NOTICE that on a date and time to be determined
by the Court, the undersigned attorneys for Third-Party Defendant, H.P.

Delta, Inc., will move the United States Court for the Southern District of New York, before the Honorable Shira A. Scheindlin, U.S. District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, for an order granting summary judgment on behalf of Third Party Defendant, H.P. Delta, Inc.

PLEASE TAKE FURTHER NOTICE that Third Party Defendant, H.P. Delta, Inc., **requests oral argument if opposition is filed.**

Respectfully submitted,

Dated: December 6, 2013

/s/ Stuart J. Lieberman
Stuart J. Lieberman, Esq.
Michael G. Sinkevich, Esq. (MS4355)
Lieberman & Blecher, P.C.
100 Jefferson Plaza, Suite 400
Princeton, New Jersey 08540
Phone: 732 355-1311
Fax: 732 355-1310
sjl@liebermanblecher.com
mgs@liebermanblecher.com